

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04 CV 10746 JLT

IVAN SANTIAGO,
Plaintiff

v.

WILLIAM J. FEENEY, MARCUS
EDDINGS, and the CITY OF BOSTON,
Defendants

JOINT STATEMENT

Pursuant to the Court's Notice of Scheduling Conference and Rule 16.1(D) of the Local Rules of the United States District Court for the District of Massachusetts, counsel for the above named parties have conferred and propose the following pretrial schedule:

1. Joint Discovery Plan and Motion Schedule:

The parties propose the following pre-trial schedule:

- (a) Automatic document disclosure will be completed as required in the Court's Discovery Order dated September 2, 2004;
- (b) All depositions are to be completed by March 30, 2005, except for expert witness;
- (c) The plaintiffs' expert witnesses shall be designated by March 31, 2005, and defendants' expert witnesses shall be designated within 30 days after plaintiff discloses said expert(s) as contemplated by Fed. R. Civ. P. 26(b)(4)(A); designation of experts shall include provision of any information required by the Federal Rules of Civil Procedure and/or the Local Rules of the District of Massachusetts; any expert depositions shall be completed within 30 days of defendants' expert designation;
- (d) All dispositive motions are to be filed by April 30, 2005, and responses are to be filed thirty days thereafter;
- (e) The plaintiff shall name other parties, if any, not later than March 15, 2005;

(f) A final pre-trial conference will be held per order of the Court.

2. A list of witnesses each party wishes to depose will be provided as required in the Court's Discovery Order dated September 2, 2004.
3. Certifications regarding each parties' consultation with counsel regarding budgets and alternative dispute resolution will be filed separately.

PLAINTIFF IVAN SANTIAGO
By his attorney:

S/ Stephen Hrones

Stephen Hrones, Esq. BBO#242860
Hrones & Garrity
Lewis Wharf, Bay 232
Boston, MA 02110
(617) 227-4019

DEFENDANTS WILLIAM J. FEENEY,
MARCUS EDDINGS, and the CITY OF
BOSTON
By their attorney:

S/ Stephen G. Cox

Stephen G. Cox BBO# 566943
Assistant Corporation Counsel
City of Boston Law Department
Room 615, City Hall
Boston, MA 02201
(617) 635-4064